

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JEFF NARDINELLI**

1 I, Jeffrey W. Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this  
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and  
5 would testify competently as follows.

6 2. Waymo first produced documents in response to the Court's order (Dkt. 1272) on  
7 August 24, 2017.

8 3. After the August 31 hearing and following the Court's guidance, Waymo (i) re-  
9 produced documents produced on August 24, but with fewer redactions and (ii) produced  
10 documents that had been withheld on August 24. Waymo produced these documents on Saturday,  
11 September 2.

12 4. Defendants re-deposed Gary Brown and Sasha Zbrozek in this action on September  
13 6, 2017. Defendants re-deposed Kristinn Gudjonsson on September 8, 2017.

14 5. Today, I reviewed the expert report of Paul French, specifically Exhibit B thereto,  
15 the List of Materials Considered. Of the Waymo-produced documents on that list, all but one  
16 were produced on or before September 2, 2017, and one was produced on September 8, 2017. The  
17 latest deposition that Mr. French considered was that of Mr. Gudjonsson, from September 8, 2017.

18 6. Waymo produced the document stamped with Bates number WAYMO-UBER-  
19 00046883 on August 16, 2017.

20 I declare under penalty of perjury under the laws of the State of California that the  
21 foregoing is true and correct.

22 DATED: October 26, 2017

23 /s Jeff Nardinelli  
Jeff Nardinelli

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Jeff Nardinelli.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven